

November 23, 2015

VIA ECF

The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of Defendants Sana Bell, Inc. and Sanabel al Kheer, LLC (collectively “Sanabel”) and without opposition from Plaintiffs, I write to respectfully request an extension of the deadline to submit Sanabel’s Response to Plaintiffs’ Motion to Compel (“Motion to Compel”) filed on November 13, 2015 (EC 3127), currently set for December 4, 2015. Sanabel respectfully requests, and Plaintiffs do not oppose, an extension until December 21, 2015 to file their Response to Plaintiffs’ Motion to Compel. In conjunction with this request, Plaintiffs have agreed to file any Reply by January 7, 2016 which Sanabel does not oppose.

Plaintiffs’ Motion to Compel is quite voluminous, contains 72 exhibits and raises many issues and, as a result, will take a significant amount of time to which to respond. In addition, despite significant and best efforts, Sanabel’s counsel has not been able to reach Sanabel’s sole representative, Dr. Abdel Hillali, for quite some time. Based on past experience, Sanabel’s counsel believes Dr. Hillali might be gravely ill or out of the country for an extended period. Finally, the amount of time extension Sanabel has requested herein is in line with the amount of time other Defendants have been given to Respond to Plaintiffs’ Motions to Compel.

For these reasons, Sanabel respectfully requests, without opposition from Plaintiffs, these extensions of time of the above-mentioned deadlines and appreciates Your Honor’s attention to this request.

Respectfully submitted,



Christopher C. S. Manning
Counsel for Sana Bell, Inc. and Sanabel al Kheer, LLC

cc: The Honorable George B. Daniels (via USPS)
MDL-1570 Counsel of Record (via email)